

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

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**DALE and JENNIFER HARRIS, as Parents of RNH  
Plaintiffs,**

**Civil Action No.:**

**v.**

**1:24-CV-12437-PGL**

**MARGARET ADAMS, KATHRYN ROBERTS,  
RICHARD SWANSON, NICOLE NOSEK, SUSAN PETRIE,  
ANDREW HOEY, KAREN SHAW, JOHN BUCKEY, and  
TOWN OF HINGHAM SCHOOL COMMITTEE  
Defendants.**

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**AFFIDAVIT OF PAMELA ROTH**

I, Pamela L. Roth, upon oath and personal knowledge, hereby depose and say:

1. I am a Senior College Counselor, Director of Training and Essay Specialist for Campus Bound, located in Needham, Massachusetts.
2. Campus Bound's mission is to engage with students and families to navigate the college planning and ultimately college admission process through the extensive experience of the Campus Bound team who have backgrounds and experience as high school guidance counselors, independent educational consultants, college coaches, college consultants, college advisors, and college financial aid officers.
3. I am engaged by the Plaintiffs to provide advice and counseling regarding RNH's college application process and have been working with RNH and his family since January, 2024. Prior to that I worked with RNH's older brother, a member of Hingham High's Class of 2022.
4. I hold an AB from Mount Holyoke College and an MAT from Brown University.
5. I have extensive experience in education, including 14 years as an English teacher and 12

years on both sides of the admissions desk, first in the Office of Admissions at the University of Rochester and then as the head of college counseling at an independent school.

6. RNH is a high performing student who has always challenged himself with the most advanced courses available. Because of this, RNH has the opportunity to apply for early decision or early action at some of the nation's most elite colleges and universities, including his first choice of Stanford University, located in Pao Alto, California. Last year, Stanford as well as a number of its peer institutions, admitted 4%.
7. These schools command an extensive applicant pool of high academic achievers with high test scores, and grade point averages, including grades almost exclusively in the A range. Thousands of extremely well-qualified students, who elsewhere would be highly admissible, were denied.
8. Any applicant to a top-tier institution must have the most competitive transcript possible.
9. A C+ is a red flag that will be noticed far more quickly and glaringly than the highly competitive curriculum with by and large top grades, a 36 ACT (highest score possible) and a very solid resume.
10. In order for RNH to apply to Stanford by November 1, which means submitting no later than October 25th, his transcript issue must be resolved by early October so that when RNH requests his transcripts, they reflect grades commensurate with his achievement and not marred by the incident that gave rise to this case.
11. In my extensive experience working as a college coach, letter grades of "C" in this type of admissions environment would significantly decrease the probability of admission.
12. Additionally, transcripts and information regarding any disciplinary infraction, especially

one regarding an academic integrity infraction, are a substantial and material impediment to the applicant being able to compete with other applicants who have transcripts that do not have any notation of discipline of any kind.

13. I am generally aware of the allegations and facts of this case.
14. I reviewed RNH's transcript as part of my role as his college counselor.
15. These actions set forth herein are all substantial contributing factors that will significantly decrease the likelihood of admission at a highly selective school such as Stanford or similar universities.
16. These applications are due imminently with applications for early decision and early action being due on or before November 1, 2024.

Signed under the pains and penalties of perjury this 18<sup>th</sup> day of October, 2024.

*Pamela L. Roth*  
Pamela L. Roth (Oct 18, 2024 15:14 EDT)  
Pamela L. Roth